

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

07CRIM. 733

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UNITED STATES OF AMERICA

: INFORMATION

: -v.-

: Violations of  
18 U.S.C. §§ 1344, 2,  
1349

PAUL SULLINS,

:

Defendant. :  
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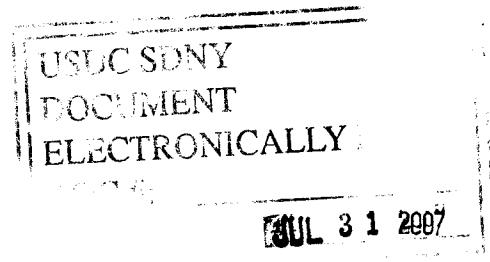
COUNT ONE

JUDGE HOLWELL

The United States Attorney charges:

1. From on or about August 23, 2004, up to and including on or about September 24, 2004, in the Southern District of New York and elsewhere, PAUL SULLINS, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were insured by the FDIC, and obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, SULLINS met with another individual in Manhattan and attempted to sell to the other individual a stolen \$5,100 check.

(Title 18, United States Code, Sections 1344 and 2.)



COUNT TWO

The United States Attorney further charges:

2. From at least on or about August 23, 2004, up to and including on or about September 24, 2004, in the Southern District of New York and elsewhere, PAUL SULLINS, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together, and with each other, to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

3. It was a part and object of the conspiracy that PAUL SULLINS, the defendant, unlawfully, willfully, and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were insured by the FDIC, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

Overt Acts

4. In furtherance of said conspiracy and to effect the illegal object thereof, PAUL SULLINS, the defendant, committed the following overt acts, among others, in the Southern

District of New York and elsewhere:

- a. On or about August 24, 2004, SULLINS met with a co-conspirator, not charged herein, in New York, New York.
- b. On or about September 7, 2004, SULLINS met with a co-conspirator, not charged herein, in New York, New York.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

5. As the result of committing the offenses in violation of Title 18, United States Code, Sections 1349, 1344 and 2, as alleged in Counts One and Two of this Information, PAUL SULLINS, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that represents or is traceable to the gross receipts obtained, directly or indirectly, from the commission of the charged offenses, including but not limited to the following:

- a. At least \$2,000.00 in United States currency, in that such sum in aggregate is property representing the amount of monies obtained as a result of the offenses charged in Counts One and Two of this Indictment.

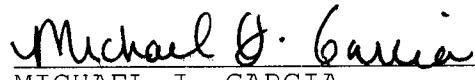
Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, and Title 28, United States Code, Section 2461; Title 21, United States Code, Section 853(p).)

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

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INFORMATION

07 Cr.

(18 U.S.C. § 1349,  
18 U.S.C. §§ 1344 & 2.)

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MICHAEL J. GARCIA  
United States Attorney.

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